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Attorney for Plaintiff

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

ROBERT L. GOLDMAN;

Plaintiff,

v.

VIGILANT INSURANCE COMPANY, a New
York corporation and member of the CHUBB
GROUP OF INSURANCE COMPANIES;
DOES 1 through 100, inclusive; and ROE
CORPORATIONS I through 100, inclusive,

Defendants.

Case No.: 2:19-cv-2227-JAD-BNW

**STIPULATION & ORDER
REGARDING BRIEFING SCHEDULE
ON VIGILANT INSURANCE
COMPANY'S MOTION FOR
SUMMARY JUDGMENT**

(Seventh Request)

ECF No. 52

Pursuant to LR IA 6-1, PLAINTIFF ROBERT L. GOLDMAN ("Plaintiff") and
DEFENDANT VIGILANT INSURANCE COMPANY ("Defendant") (collectively, the
"Parties"), by and through their respective counsel, hereby stipulate and agree to extend the time
for Plaintiff to respond to Vigilant Insurance Company's Motion for Summary Judgment (ECF
No. 33). Specifically, Plaintiff shall have through and including **January 5, 2022** with which to
file its Opposition brief. The extension will enable Plaintiff to incorporate relevant evidence
from the deposition of Defendant's claims processing expert (Ed McKinnon), completed on
December 16, 2021, into Plaintiff's Opposition brief which, in turn, will obviate the need for
Plaintiff to request Fed.R.Civ.P. 56(d) relief related to the testimony of this witness. Although an
expedited transcript of that deposition was ordered, it will not be available for several days and,
in light of the holiday season, the parties have agreed to extend the outstanding briefing schedule

1 so that counsel (who have been working cooperatively with one another) can spend that time
2 with their family members and loved ones.

3 DATED this 20th day of December, 2021.

4 MARQUIZ LAW OFFICE, P.C.

LEWIS BRISBOIS BISGAARD & SMITH LLP

5 By: /s/ Craig A. Marquiz
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12 By: /s/ Jason P. Kasting
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15 2800 North Central Avenue, Suite 1600
16 Phoenix, AZ 85004
Attorneys for Defendant

17 **ORDER**

18 IT IS SO ORDERED.

19 DATED this 28th
20 of December, 2021.

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23 UNITED STATES DISTRICT JUDGE
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